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8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 JOVAN P. BLANTON,

11 Plaintiff,

12 v.

13 LOUIS DEJOY, Postmaster General,

14 Defendant.

Case No. 2:23-cv-02102-RFB-EJY

Stipulation and Order to
Extend Discovery Deadlines
(First Request)

15 Pursuant to LR IA 6-1 and LR 26-3, the parties request a 90-day extension of certain
16 discovery deadlines as, and for the reasons, set forth below. There is a good cause for such
17 extension as the parties have conducted discovery diligently and in good faith. However, the
18 parties need additional time to complete discovery including taking depositions and
19 responding to discovery. Some of the witnesses are not available for a deposition until after
20 the close of discovery. The parties request the extension of the close of discovery, dispositive
21 motions and pretrial order deadlines. This is the first request for an extension of the
22 discovery schedule.

23 **DISCOVERY COMPLETED**

24 The parties served their respective initial disclosures. Federal Defendant served
25 discovery requests on Plaintiff, which Plaintiff is in the process of responding.

26 **DISCOVERY REMAINING**

27 The parties need to conduct depositions of the plaintiff, his former supervisors with
28 the United States Postal Service and any other percipient witnesses.

WHY REMAINING DISCOVERY HAS NOT BEEN COMPLETED

The parties respectfully request the additional time to finish discovery in this employment discrimination case by conducting depositions and responding to discovery. The reason why the remaining discovery has not been completed is due to the parties and witnesses' schedules. Due to the scheduling issues, some witnesses are not available for a deposition until after the close of discovery which currently is March 10, 2025. For these reasons and in good cause, the parties request the 90-day extension of all remaining discovery deadlines.

EXTENSION OF THE DISCOVERY PLAN AND SCHEDULING ORDER

The following table sets forth the current deadlines and the proposed extended deadlines that are the subject of this stipulated request:

SCHEDULED EVENT	CURRENT DEADLINE	PROPOSED DEADLINE
Rebuttal Expert Disclosures	February 10, 2025	February 10, 2025
Discovery Cutoff	March 10, 2025	June 10, 2025
Dispositive Motions	April 9, 2025	July 10, 2025
Proposed Joint Pretrial Order	May 9, 2025	August 11, 2025 ¹

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¹ If dispositive motions were filed, the deadline for the Proposed Joint Pretrial Order would be deferred until 30 days after the Court rules on the dispositive motions.

1 This request for an extension of time is not sought for any improper purpose including
2 delay.

3 Respectfully submitted this 28th day of January 2025.

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5 LAW OFFICE OF MICHAEL B.
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/s/ Virginia T. Tomova
VIRGINIA T. TOMOVA
Assistant United States Attorney

10 **IT IS SO ORDERED:**

11 
12 **UNITED STATES MAGISTRATE JUDGE**

13
14 **DATED:** January 28, 2025